# U.S. DISTRICT COURT EASTERN DISTRICT-WI

# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff,

21-CR-045

v.

Case No. 21-CR-

AQUINUS S. ROGERS,

[18 U.S.C. §§ 922(g)(1), 924(a)(2), 924(c), and 1951(a)]

Defendant.

#### **INDICTMENT**

#### **COUNT ONE**

#### THE GRAND JURY CHARGES THAT:

- 1. At all times material to this Indictment, Community Financial Service Center, located at 2534 West Wisconsin Avenue in Milwaukee, Wisconsin, was a business engaged in the purchase and sale of articles and commodities in interstate and foreign commerce.
- 2. On or about December 12, 2020, in the State and Eastern District of Wisconsin,

#### **AQUINUS S. ROGERS**

attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that the defendant attempted to take and obtain

United States currency from and in the presence of an employee of Community Financial Service Center against her will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Section 1951(a).

# **COUNT TWO**

# THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2020, in the State and Eastern District of Wisconsin,

# **AQUINUS S. ROGERS**

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence, namely attempted Hobbs Act robbery as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(C)(i).

#### **COUNT THREE**

#### THE GRAND JURY FURTHER CHARGES THAT:

- 1. At all times material to this Indictment, Community Financial Service Center, located at 2636 West Fond du Lac Avenue in Milwaukee, Wisconsin, was a business engaged in the purchase and sale of articles and commodities in interstate and foreign commerce.
- 2. On or about December 18, 2020, in the State and Eastern District of Wisconsin,

#### **AQUINUS S. ROGERS**

attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that the defendant attempted to take and obtain United States currency from and in the presence of an employee of Community Financial Service Center against her will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Section 1951(a).

#### **COUNT FOUR**

## THE GRAND JURY FURTHER CHARGES THAT:

- 1. At all times material to this Indictment, Community Financial Service Center, located at 8921 West Brown Deer Road in Milwaukee, Wisconsin, was a business engaged in the purchase and sale of articles and commodities in interstate and foreign commerce.
- 2. On or about December 18, 2020, in the State and Eastern District of Wisconsin,

#### **AQUINUS S. ROGERS**

did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that the defendant took and obtained United States currency from and in the presence of an employee of Community Financial Service Center against her will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Section 1951(a).

#### **COUNT FIVE**

# THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2020, in the State and Eastern District of Wisconsin,

# **AQUINUS S. ROGERS**

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence, namely Hobbs Act robbery as charged in Count Four of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(C)(i).

# **COUNT SIX**

## THE GRAND JURY FURTHER CHARGES THAT:

 On or about December 18, 2020, in the State and Eastern District of Wisconsin,

#### AQUINUS S. ROGERS,

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as black Taurus G2C 9mm semiautomatic handgun with a silver barrel and silver ejection port, bearing Serial No. ABG669749.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL:

FOREPERSON

Dated

/ RICHARD G. FROHLIN

Acting United States Attorney